

REMARKS

At the outset, Applicants wish to thank the Examiner for the indication that the present application contains allowable subject matter. Specifically, dependent claims 9-10, 22-23, and 49 were deemed allowable if rewritten in independent form. As seen below, independent claim 15 has been amended to incorporate the features of allowable claim 22 (and intervening claim 21), and independent claim 48 has been amended to incorporate the features of allowable claim 49. Accordingly, independent claims 15 and 48, and corresponding dependent claims 16-20, 23-30, 32-36, 39 and 50, are believed to be in condition for allowance. Applicants respectfully submit that the other claims are also allowable, as discussed below.

Claims 1-30, 32-36, 39-45, and 47-49 were pending in the Office Action. Upon entry of the present amendment, claims 21, 22 and 49 are canceled without prejudice or disclaimer, claims 1, 2, 5, 6, 7, 11, 14-20, 23-30, 35, 36, 39-40¹, 45 and 48 are amended, and new dependent claims 50-53 are added. No new matter is added with this amendment. The treatment of the pending claims in the Office Action is as follows:

- claims 48-49, 32-36, and 39 stand rejected under 35 U.S.C. 101 as being directed to non-statutory subject matter
- claims 1-8, 13-21, 27, 32-36, and 48 stand rejected under 35 U.S.C. 103(a) as being unpatentable over an alleged three-way combination of Huttunen et al. (U.S. Patent No. 6,356,761), Strahm et al. (U.S. Patent Publication No. 2002/0133598), and Jackel et al. (U.S. Patent No. 6,725,268);

¹ The amendment to claim 40 only affects its preamble, and is not believed to necessitate a new grounds of rejection if one is made. Accordingly, Applicants submit that any new rejection of claim 40 cannot be properly made final in a subsequent action. Additionally, the preambles to many of the claims herein have been simplified, and these changes are not believed to harm their patentability.

- claim 47 stands rejected under 35 U.S.C. 103(a) as being unpatentable over an alleged combination of Huttunen et al. and Strahm et al.;
- claims 40-43 stand rejected under 35 U.S.C. 103(a) as being unpatentable over an alleged combination of Huttunen et al. and Jackel et al.;
- claims 11-12, 24-26, and 39 stand rejected under 35 U.S.C. 103(a) as being unpatentable over an alleged four-way combination of Huttunen et al., Strahm et al., Jackel et al., and Chun et al. (U.S. Patent Application Publication No. 2002/0083029);
- claims 28-30 stand rejected under 35 U.S.C. 103(a) as being unpatentable over an alleged four-way combination of Huttunen et al., Strahm et al., Jackel et al., and Szutu (U.S. Patent Application Publication No. 2001/0047395);
- claim 44 stands rejected under 35 U.S.C. 103(a) as being unpatentable over an alleged three-way combination of Huttunen et al., Jackel et al., and Chun et al.;
- claim 45 stands rejected under 35 U.S.C. 103(a) as being unpatentable over an alleged combination of Huttunen et al. and Chun et al.;

Applicants respectfully address these rejections below, and submit that the amendments contained herein will place the present application in condition for allowance.

The Rejection Under 35 U.S.C. 101

As an initial matter, the Office Action contends that claims 48-49, 32-36, and 39 are directed to non-statutory subject matter, because they are directed to a “machine readable medium.” The Office Action cites no authority for the proposition that “machine-readable media” are not statutory, and offers no reason for why “machine-readable media” is any different from “computer-readable media” for purposes of 35 U.S.C. 101. If this rejection is to be

maintained, Applicants request a citation to authority, rule, or explanation for the notion that a machine-readable medium is not statutory while a computer-readable medium is.

Applicants submit that no such authority or rule exists. Indeed, the Patent Laws, at 35 U.S.C. 101, expressly state that “any new and useful process, machine, manufacture, or composition of matter, or any new and useful improvement thereof,” may be patented. (emphasis added). The claimed machine-readable medium, just like a computer-readable medium, easily qualifies as at least a “manufacture.” Applicants respectfully request that the rejection under 35 U.S.C. 101 be reconsidered and withdrawn.

Independent Claim 1 and Dependent Claims 2-14

Amended independent claim 1 recites, among other features, the following:

first wireless network that stores a hierarchical generic service name tree containing a plurality of generic service names each associated with a default Internet information resource, wherein a first subset of said generic service names is mapped in said tree to a plurality of associated default Internet information resources by said first wireless network, and wherein a second subset of said service names is mapped in said tree to a plurality of non-default Internet information resources by said first wireless network, thereby overriding said default associations for said second subset of service names within said first wireless network

None of the applied references teaches or suggests submitting a first generic service name to a first wireless network that stores a hierarchical generic service name tree as recited. For example, the primary reference, Huttenen et al., fails to teach or suggest the recited hierarchical generic service name tree having the first and second subsets of service names, and the overriding of default associations for the second subset, as recited. Instead, the alleged generic service name of Huttenen et al. (“regioninfo.com”) is only used by Huttenen et al. as a signal to

the AN (access node) that it needs to query the MSC (mobile switching center) or VLR (visitor location register) to look up the location of the user before modifying the user's query and sending it to the DNS. See, e.g., col. 9, lines 54-55 and col. 10, lines 54 et seq (e.g., "regioninfo.com" is replaced by "3w.hel.fi").

The secondary reference, Jackel et al., is cited for the status images 24, 26, 28, but those images do not teach or suggest the claimed hierarchical generic service name tree. For example, those images each display information regarding the status of a web site, and there is no discussion of how those images are "hierarchical" or "generic" as claimed.

The remaining references also do not overcome the deficiencies discussed above. Chun et al. is cited only to show language translation features, while Strahm et al. is cited for different wireless networks, and neither teaches or suggests a modification to Huttenen et al. or Jackel et al. that would overcome the deficiencies identified above. Accordingly, Applicants respectfully submit that amended independent claim 1 distinguishes over the art of record, and is in condition for allowance. Claims 2-14 depend from claim 1, and are distinguishable for at least the same reasons as claim 1, and further in view of the features recited therein. For example, the Office Action had previously indicated that claims 9 and 10 recited allowable subject matter.

Independent Claim 15 and Dependent Claims 16-20 and 23-30

As noted above, claim 15 has been amended to incorporate language from claims 22 and 23, which were deemed in the Office Action to be allowable if rewritten in independent form. These claims have also been amended to simplify their preambles, but the changes are not believed to detract from their allowability. Accordingly, Applicants submit that these claims (15-20 and 23-30) are in condition for allowance.

Independent Claim 40 and Dependent Claims 41-44

Independent claim 40 recites, among other features, the following:

in response to detecting said discovery request, providing a multi-level hierarchical directory of generic service names to said requesting mobile terminal for display to a user

In rejecting this claim, the Office Action combines Huttenen et al. and Jackel et al., relying on Jackel et al. for the feature quoted above. Applicants respectfully submit that, even if combined as alleged, the resulting combination would fail to teach or suggest this response to a discovery request. For example, the claim recites providing a multi-level hierarchical directory of generic service names to said requesting mobile terminal for display to a user. The alleged combination would not provide such a directory of generic service names to a requesting mobile terminal for display to a user. In the alleged hypothetical combination, a Huttenen et al. user would type in “regioninfo.com” into a web browser, that request would be modified to include the user’s location information (e.g., to be “3w.hel.fi”), and would be sent to a DNS for a query, and the user would then be presented with a corresponding web page that would include the status images of Jackel et al. Those displayed status images would contain, as Jackel et al. states, status information from underlying web sites (e.g., stock quotes, sports scores, weather information, etc.), but would not be a hierarchical directory of generic service names, as recited in claim 40. To the contrary, the web page that the user would see in this hypothetical combination would not be generic, but would instead already be customized to the location of the user requesting the web page.

For at least these reasons, Applicants submit that amended independent claim 40 is distinguished over the applied references, and is in condition for allowance. Claims 41-44 depend from claim 40, and are thus allowable for at least the same reasons as claim 40, and further in view of the various features recited therein.

Independent Claim 45 and Dependent Claims 51-52

Amended independent claim 45 recites, among other features, the following:

storing a plurality of generic service names in a database in the memory, each of the generic service names being mapped to a plurality of alternate information resources in a plurality of different languages, wherein said alternate information resources provide a common type of service, and further wherein a generic service name mapped to a non-default information resource has overridden a generic service name mapped to a default information resource

None of the applied references, either alone or in combination, teach or suggest a processor performing as recited in amended independent claim 45. For example, the references fail to teach or suggest the generic service name mapped to a non-default information resource has overridden a generic service name mapped to a default information resource. The Huttenen et al. table assigns an IP address to each base station, but the reference does not identify any such overriding or a default information resource. For at least this reason, Applicants submit that amended independent claim 45 is distinguished over the applied references, and is in condition for allowance. Claims 51 and 52 depend from claim 45, and are distinguishable for at least the same reasons as claim 45, and further in view of the features recited therein.

Independent Claim 48 and Dependent Claims 32-36, 39 and 50-51

As noted above, claim 48 has been amended to incorporate language from claim 49, which was deemed allowable if rewritten in independent form. Dependent claims 32-36, 39 and new claims 50-51 depend from claim 48, and are distinguishable for at least the same reasons as claim 48, and further in view of the various features recited therein.

Conclusion

For at least the reasons set forth above, Applicants submit that pending claims 1-20, 23-30, 32-36, 39-45, 47-48 and 50-53 are distinguishable over the applied references, and are in condition for allowance. However, if the Examiner feels that additional discussion and/or amendment would be helpful, the Examiner is invited to telephone Applicants' undersigned representative at the number appearing below.

Respectfully submitted,

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